

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Paul N. Mirabelli Esq
3400 Highway 35 Suite 4
Hazlet, NJ 07730

In Re:

Rose M. Walsh

Case No.: 19-12210

Judge: Michael B. Kaplan

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following **(choose one)**:

1. ☐ Motion for Relief from the Automatic Stay filed by _____ ,
creditor,

A hearing has been scheduled for _____ , at _____ .

- ☒ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for 2/26/20 , at 9 AM .

- ☐ Certification of Default filed by _____ ,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons **(choose one)**:

- ☐ Payments have been made in the amount of \$ _____ , but have not
been accounted for. Documentation in support is attached.

☒ Payments have not been made for the following reasons and debtor proposes

repayment as follows (**explain your answer**):

I have deposited with my attorney Paul N. Mirabelli Esq \$1700 towards the arrears in my Chapter 13 Plan Payments.

☒ Other (**explain your answer**):

In addition, the balance will be paid through the modified Chapter 13 Plan which I filed today. The Modified Plan addresses the late Proof of Claim filed by PNC Bank and the prior plan claims of Union Beach Sewer Department and Tax Collector.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 2/24/20

/s/ Rose M. Walsh
Debtor's Signature

Date: _____

Debtor's Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.